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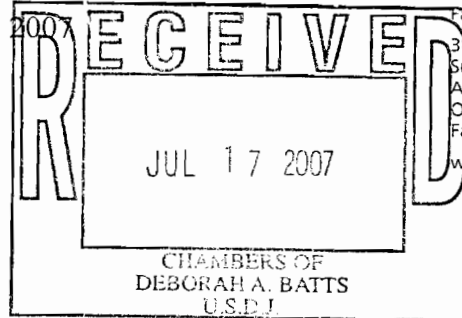
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July 16, 2007



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**VIA OVERNIGHT MAIL
AND FACSIMILE**

Hon. Deborah A. Batts
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2510
New York, New York 10007

Re: *In re Dana Corporation: The Goodyear Tire & Rubber Company v. Dana Corporation, et al., Case No. 07-CV-06169-DAB (Bankruptcy Appeal)*

Dear Judge Batts:

I am lead attorney representing the appellant, The Goodyear Tire & Rubber Company, in the above-referenced bankruptcy appeal. My office learned last Friday that this appeal had been docketed with your Court on July 2 and that a deadline for appellant's brief had been set for July 20, 2007, only four days from today. Our phone calls to the Clerk of both of the District and Bankruptcy Courts revealed that, apparently, notice of the docketing had not been mailed to us until last Friday. (We still have not received that notice or any notice regarding the docketing of this appeal.)

The July 20 deadline for my client's opening brief would be very difficult to meet even under the best of circumstances. In addition, this case includes a variety of complex issues that would be better addressed with ample time to prepare.

I have discussed the briefing schedule with appellee's counsel, Robert J. Feinstein. He has agreed that we should propose an extended briefing schedule for all parties to this appeal that would allow my client sufficient time to prepare its opening brief, as well as time for appellees to respond. Our proposal also accommodates several planned vacations that complicate the schedule.

Therefore, the parties respectfully request that Goodyear's opening brief be due on Friday, August 31, 2007. The response briefs of appellees Dana Corporation and its Official Committee of Unsecured Creditors would be due on Wednesday, October 3,

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2007. (We are proposing that the appellees' response be delayed until several days after the end of September because of a conflicting deadline for appellate briefs due by Mr. Feinstein's firm in a separate appeal from the same bankruptcy case.) Finally, we propose that Goodyear's reply brief be due Friday, October 19, 2007.

Thank you for your attention to this request. Please do not hesitate to call me if you have any questions regarding this request. My direct telephone number is (216) 830-6804.

I will be in court tomorrow morning, July 17, and will not return to my office until the afternoon. In my absence, please call my associate, Nicole Hitch, who can be reached at (216) 830-6830.

Very truly yours,

Alan M. Koschik

AMK:rb

cc: Robert J. Feinstein, Esq.
Matthew J. Williams, Esq.
Paul Rubin, Esq.
Nicole M. Hitch, Esq.

SO ORDERED

DEBORAH A. BATTS 7/17/2007
UNITED STATES DISTRICT JUDGE

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